

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Replacement of Part 90 by)
Part 88 to Revise the Private)

PR Docket 92-235

difficultly imagining an FCC action that would have a more devastating impact on the citizens of Los Angeles County. Virtually all of the land mobile radio communications of the Los Angeles County Sheriff's Department, and most of the communications of County's Fire Department, are on frequencies in the 470-512 MHz band.^{2/} Every minute of every day these radio frequencies are used to support vital public safety operations protecting the safety of life and property. Aside from the direct harm to public safety communications, replacing the Sheriff's radio communication systems would be a waste of taxpayer resources, as the system was completed just three years ago, at a total cost of over \$60 million.

Even if the County could afford to replace its communications system hardware, it is unlikely ever to be able to find alternative radio frequencies. UHF Channel 16 (on which most of the County's 470-512 MHz system is located) was reallocated for public safety use precisely because of severe spectrum shortages in the Los Angeles area.^{3/} Yet, MSTV seems to believe that spectrum refarming will eliminate those shortages, allowing all land mobile users to be reassigned frequencies below 470 MHz. However, spectrum refarming will

^{2/} See Comments of the County of Los Angeles, California, at 2-3. Radio frequencies in the 470-512 MHz band are also used by the City of Los Angeles Police and Fire Departments, and the cities of Burbank, Glendale, Whittier, Redondo Beach, South Bay, Santa Monica, Alhambra, Culver City, Montebello, and Pasadena, California, for their public safety communications systems.

^{3/} Amendment of Parts 2, 73 and 90 of the Commission's Rules and Regulations to Allocate Additional Channels in the Band 470-512 MHz for Public Safety and Other Land Mobile Services, FCC 86-641, 51 Fed. Reg. 4352 (released Jan. 22, 1986), recon. denied, FCC 86-579 (released Feb. 25, 1986).

Therefore, for the reasons discussed above, the County urges the Commission to reject any proposals that would interfere with continued public safety land mobile use of radio frequencies in the 470-512 MHz band.

COUNTY OF LOS ANGELES,
CALIFORNIA,

CALIFORNIA